

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
1/18/2022 8:40 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL

TATYANA MORDVIN,) 16326760
)
 Plaintiff,)
) 2022L000536
 v.) No.
)
 ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S) Amount: in excess of \$ 50,000.00
 and THE KROGER CO.,)
) Hearing Date: 3/23/2022 9:30 AM
 Defendants.)

COMPLAINT

NOW COMES the Plaintiff, TATYANA MORDVIN, by and through her attorneys, KARCHMAR & LAMBERT, P.C., and complaining of the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., states as follows:

1. That on or about January 22, 2020, the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., owned, operated, maintained, managed, controlled, and held out as being reasonably safe for use, the premises known as "Mariano's" and located at or near 3358 W. Touhy Ave., in the Village of Skokie, County of Cook, and State of Illinois.
2. That on or about January 22, 2020, the Plaintiff, TATYANA MORDVIN, was a business invitee and lawfully on the premises known as "Mariano's" and located at or near 3358 W. Touhy Ave., in the Village of Skokie, County of Cook, and State of Illinois.
3. At all times relevant, the Plaintiff, TATYANA MORDVIN, exercised due care and caution for her own safety and that of those around her.
4. At all times relevant herein, it was the duty of the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., to exercise reasonable care and

diligence to keep and maintain said premises in a reasonably safe condition for ordinary use, and to warn Plaintiff of any dangerous condition on the premises which might injure her.

5. Nevertheless, at said time and place, and in disregard of their aforesaid duty, the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., caused or permitted a dangerous condition to exist at said area, to wit, a liquid substance on the floor at or near the salad/hot bar area, and, as a direct and proximate result, the Plaintiff, without any fault on her part, was caused to slip and fall to the ground, where she sustained serious and permanent injuries as hereinafter alleged.
6. Thus, at said time and place, the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., were guilty of one or more of the following negligent acts and/or omissions:
 - (a) Carelessly and negligently caused or permitted a dangerous condition to exist at said area, to wit, a liquid substance on the floor at or near the salad/hot bar area;
 - (b) Carelessly and negligently maintained the premises such that a dangerous condition existed at said area, to wit, a liquid substance on the floor at or near the salad/hot bar area;
 - (c) Carelessly and negligently failed to correct the dangerous condition at said area, to wit, a liquid substance on the floor at or near the salad/hot bar area, despite having actual and/or constructive knowledge of said dangerous condition;
 - (d) Carelessly and negligently failed to give Plaintiff warning of dangerous condition existed at said area, to wit, a liquid substance on the floor at or near the salad/hot bar area.
7. As a direct and proximate result of the careless and negligent conduct of the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., the Plaintiff, TATYANA MORDVIN, then and there sustained severe and permanent injuries, and as a direct result of this, she has been compelled and will be compelled to expend and become

legally liable for large sums of money for medical and surgical services, nursing care and attention in and about endeavoring to become healed and cured of her injuries, and she was and will be hindered and prevented from attending to her usual affairs and duties and has thereby lost and will in the future she will lose large sums of money which would otherwise have accrued to her.

WHEREFORE, the Plaintiff, TATYANA MORDVIN, prays for judgment against the Defendants, ROUNDY'S ILLINOIS, LLC d/b/a MARIANO'S and THE KROGER CO., in an amount in excess of FIFTY THOUSAND DOLLARS (\$ 50,000.00).



Matthew B. Karchmar

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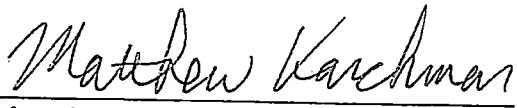
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Defendants.)

AFFIDAVIT PURSUANT TO 222(b)

That I, Matthew B. Karchmar, do hereby attest under oath to the following:

1. That I am the attorney for the Plaintiff, TATYANA MORDVIN.
2. That the money damages sought in this matter for the Plaintiff, TATYANA MORDVIN, does exceed \$ 50,000.00 (FIFTY THOUSAND DOLLARS).

I, Matthew B. Karchmar, an attorney, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Matthew B. Karchmar

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